

- b. Date for joinder/amendment:
 - c. Date for close of fact discovery:
 - d. Date for close of expert discovery, if bifurcated:
- 5. **Do the parties want a Rule 502 non-waiver order – Yes or No?**

- 6. **Are there any ESI issues to address? If yes, please explain:**

- 7. **Protective Order – Yes or No? If yes, please explain:**

Respectfully submitted,
